

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

LISA WALTERS, et al.,	)	
	)	
Plaintiffs,	)	CIVIL ACTION FILE NO.
	)	
v.	)	_____
	)	
BRIAN KEMP, et al.,	)	
	)	
Defendants.	)	

**DECLARATION OF ALAN GOTTLIEB**

I, Alan Gottlieb, declare as follows:

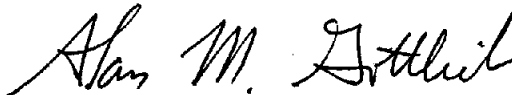
1. I am the Executive Vice President of the Second Amendment Foundation, Inc. (“SAF”).
2. SAF is a non-profit corporation organized under the laws of the State of Washington with its principal place of business in Bellevue, Washington.
3. SAF has over 650,000 members and supporters nationwide, including in Cherokee County, Georgia, and other places in the State.
4. Plaintiff Lisa Walters, and her husband, Mark Walters, are members of SAF.
5. The purposes of SAF include promoting the exercise of the right to keep and bear arms and legal action focusing on the constitutional right to privately own and possess firearms.

6. SAF also promotes research and education on the consequences of abridging the right to keep and bear arms and on the historical grounding and importance of the right to keep and bear arms as one of the core civil rights of United States citizens.
7. As detailed in the Complaint, Plaintiff Lisa Walters and other similarly situated individuals would exercise the fundamental human right to keep and bear arms for self-defense and lawful purposes, in public and outside the home, with loaded, operable handguns carried on or about their person but for Defendants' laws and orders, enforcement policies, practices, customs, and actions, and reasonable fear of liability, arrest, and prosecution.
8. In the State of Georgia, most individuals, like and including Plaintiff Walters, are completely forbidden from carrying loaded operable handguns outside of their home, vehicle, or place of business unless they acquire and possess a Georgia Weapons License ("GWL").
9. By issuing and enforcing an order refusing to accept and process GWL applications, and issue a GWL to eligible individuals, like and including Plaintiff Walters, Defendants Wood and Cherokee County have eliminated every avenue for law-abiding Cherokee County residents to avoid liability under the State's criminal laws and lawfully carry a loaded operable handgun in public outside of their home, vehicle, or place of business.

10. If the Defendants' laws and enforcement policies, practices, and customs are not enjoined, additional harm will result in the form of ongoing inability of law-abiding citizens, including our members, to exercise their right to keep and bear loaded, operable handguns to protect themselves and their families in case of confrontation in public outside the home.
11. SAF has and continues to expend and divert resources, and has been and continues to be adversely and directly harmed, because of Defendants' laws and orders, and their enforcement policies, orders, practices, customs, and actions challenged herein.
12. Accordingly, and for the reasons set forth in Plaintiffs' Complaint and Application and Motion, I respectfully ask this Court to grant the Plaintiffs' Application for Temporary Restraining Order and Motion for Preliminary Injunction.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 15, 2020.

  
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Alan Gottlieb